

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11,
2001

03-md-1570
(GBD)(SN)

This document relates to: *All Cases*

DECLARATION OF EMILY RYBICKI

I, Emily Rybicki, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a paralegal with the law firm Anderson Kill P.C.
2. I am the lead paralegal at this firm working on the above-referenced case on behalf of the *O'Neill* plaintiffs.
3. On June 17 and 18, 2021, I received via email from the court reporter, rough transcripts of the deposition of Mussaed al Jarrah. Although I understand those are not in issue, I promptly forwarded the rough transcripts to Jerry S. Goldman, Esq., Bruce Strong, Esq., and Robert Horkovich, Esq. by email. I have not otherwise copied, printed, forwarded, or otherwise provided electronic or hard copies of the rough transcripts to anyone within or outside of Anderson Kill.
4. On June 28, 2021, I received via email the final transcripts of the Mussaed al Jarrah deposition from the court reporter. At that time, I was working on other time-sensitive projects, so I did not immediately file the transcripts in our electronic file system. My computer and email are password-protected and secure and there is no evidence of any unauthorized access to my computer or email between June 28, 2021 and the present. My computer is set, by default, to lock, upon a period of inactivity and cannot be accessed without the use of a password.

5. From July 1, 2021 through July 6, 2021, I was out of the office on vacation. I returned to work on July 7, 2021. That day, I received an email from the court reporter with a link to the videos of the Jarrah deposition. I was working on other time-sensitive projects at that time so I did not immediately file the videos in our electronic file system.

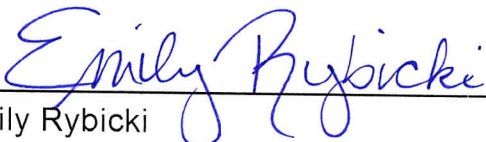
6. Early in the morning on July 13, 2021, I moved the transcripts and the videos of the Jarrah deposition into a secure shared folder on our electronic file system that was created primarily for downloading confidential deposition materials from the September 11, 2001 litigation. Only Jerry S. Goldman, Esq., Bruce Strong, Esq., Robert Horkovich, Esq., two members of our IT department (Robin Pramanand and Mark Guercio), and I have access to the folder.

7. Except as noted above, at no time did I copy, print, forward, or otherwise provide electronic or hard copies of the Jarrah deposition transcripts to anyone at Anderson Kill, or individuals outside the firm, via email or other delivery methods.

8. I have never spoken to or contacted Michael Isikoff in any way about anything, including the Jarrah deposition or the transcripts.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Warrington, Pennsylvania on July 29, 2021.


Emily Rybicki